

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

- against -

ROBERT BERNARDI, NIHAT CARDAK, and  
SUNIL CHANDRA,

Defendants.  
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NOTICE OF MOTION

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ECF Case

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No. 21 Civ. 8598 (VM)

PLEASE TAKE NOTICE that upon the Complaint in the above-captioned action; the Indictment in the criminal case *United States v. Robert Bernardi et al.*, 21 Cr. 616 (PGG) (the “Criminal Case”); and the accompanying memorandum of law, the United States of America, by its attorney Damian Williams, United States Attorney for the Southern District of New York, and Peter J. Davis and Emily A. Johnson, Assistant United States Attorneys, will move this Court for an order (i) to intervene in the above-captioned case, pursuant to Rule 24 of the Federal Rules of Civil Procedure, and (ii) to stay this matter in its entirety until the conclusion of the Criminal Case, as well as for such other relief as the Court deems just and proper.

Dated: New York, New York  
November 16, 2021

DAMIAN WILIAMS  
United States Attorney

/s/ \_\_\_\_\_  
Peter J. Davis  
Emily A. Johnson  
Assistant United States Attorneys  
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